

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 1 of the Commission's Rules,	)	MD Docket No. 10-234
Concerning Practice and Procedure, Amendment	)	
of CORES Registration System	)	
	)	

**COMMENTS OF FRONTIER COMMUNICATIONS CORPORATION**

Frontier Communications Corporation (“Frontier”) hereby submits the following comments in response to the Federal Communications Commission’s (“Commission”) request for comment on its *Notice of Proposed Rulemaking* addressing reforms in the Commission’s CORES registration system.<sup>1</sup> Frontier, which operates a telecommunications network across 27 states and is the largest provider of communications services in rural America, frequently conducts business with the Commission via CORES and applauds the Commission’s efforts to streamline and reform the system. Frontier believes that the changes outlined herein would be beneficial towards making CORES more efficient for both the Commission and the companies doing business with it.

**I. PROPOSED OPTION 2 PROVIDES THE MOST EFFICIENT MECHANISM FOR MEETING THE COMMISSIONS GOALS OF LINKING FRNS AT A CORPORATE LEVEL**

Frontier agrees with the Commission’s tentative conclusion that a “single unique identifier” for each entity registered with CORES would be beneficial, provided that the new system allows Frontier sufficient flexibility to choose its own method of doing business with the Commission.

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<sup>1</sup> *In re: Amendment of Part 1 of the Commission’s Rules, Concerning Practice and Procedure, Amendment of CORES Registration System*, MD Dkt. No. 10-234, *Notice of Proposed Rulemaking*, 25 FCC Rcd. 17407 (rel. Dec. 7, 2010) (“*NPRM*”).

Frontier supports the Commission’s clarification that “entities are defined by the use of single TIN” and that “affiliated entities that are part of a larger corporate structure would not be limited to use of the same [FCC registration number] (“FRN”) if they have obtained separate TINs from the IRS.”<sup>2</sup> Frontier is a complex corporation made up of over 100 taxpayer identification numbers (“TIN”) and proper accounting requires Frontier to conduct individual transactions for each TIN. Though it is a necessity for Frontier to operate separate transactions based on the underlying TIN involved, Frontier supports the Commission’s efforts to link these numbers together at a higher corporate level.

Frontier believes that the Commission’s proposed “Option 2”<sup>3</sup> is the best course forward to complete the Commission’s goal of providing a single corporate identifier while maintaining individual FRN for each TIN. “Option 2” will allow corporations holding many FRNs to retain those FRNs while they are collectively linked via a common corporate prefix.<sup>4</sup> The prefix would be automatically assigned and individual corporations would not be required to include the prefix as it would be automatically linked with other FRNs for internal Commission use.<sup>5</sup> Frontier believes this is the best option because it does not impose the administrative burdens on licensees of reconfiguring their systems under a single FRN as would be required under “Option 1.”<sup>6</sup> Frontier currently uses nearly 100 different FRNs and views “Option 2” as far superior to “Option 1,” which would require Frontier to change its administrative and accounting systems and re-register each of its FRNs in order to do its required business with the Commission. Frontier estimates that “Option 2” would save dozens of man hours and achieve all of the functionality that the Commission desires.

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<sup>2</sup> *Id.* at ¶ 16.

<sup>3</sup> *Id.* at ¶ 19.

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> *Id.* at ¶ 18.

The Commission also notes that “Option 2” would “reduc[e] the potential burden on both regulated entities and the Commission, especially in the wake of future mergers and acquisitions among different entities that currently hold an FRN in CORES.”<sup>7</sup> As a corporation that has recently undergone a transformational transaction that nearly tripled its size,<sup>8</sup> Frontier believes that the Commission is correct that “Option 2” would minimize the administrative burden on the newly-combined corporation during an already complex integration process. Minimizing this burden allows all corporations involved with a transaction to conduct business with the Commission in a more seamless post-transaction fashion. For all these reasons Frontier urges the Commission to adopt “Option 2” as the means to best accomplish its goal of linking a corporate structure without imposing undue administrative burdens.

## **II. ALLOWING MULTIPLE POINTS OF CONTACT IN PRE-DESIGNATED FIELDS WOULD MAKE FOR A MORE EFFICIENT PROCESS**

Frontier supports the Commission’s proposal to expand the FRN holder’s ability to designate multiple points of contact for different issues that may arise. As a result of its experience, Frontier believes the Commission is correct in concluding that “the inability of FRN holders to identify additional points of contact for the FRN unnecessarily limits the FRN’s usefulness to the FRN holder, as well as to the Commission” and supports allowing a FRN holder to “voluntarily provide additional points of contact for their FRN.”<sup>9</sup> This additional functionality would provide no required burden on the FRN holder, who can decide how many additional contacts to add and how to manage and organized these contacts, if they choose to do so at all. The net effect would

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<sup>7</sup> *Id.* at ¶ 19.

<sup>8</sup> *See in re: Applications Filed by Frontier Communications Corporation and Verizon Communications Inc. for Assignment or Transfer of Control*, WC Docket No. 09-95, *Memorandum Opinion and Order*, 25 FCC Rcd. 5972 (rel. May 21, 2010) (“*Frontier Merger Order*”). Frontier completed its merger with Verizon on July 1, 2010.

<sup>9</sup> *NPRM* at ¶ 25.

be to streamline the Commission's contact with the FRN holder by quickly routing inquiries to the appropriate contact, which can be especially valuable in a large corporation.

In implementing the multiple point-of-contact feature, Frontier believes that the best course would be to have the Commission pre-designate functions as it proposes in the *NPRM*.<sup>10</sup> Standardizing functional terms across entities doing business with the Commission would improve the Commission's own efficiency. The goal is for the Commission to quickly route information to appropriate contacts; to the extent individual users are creating their own terms they may not be easily recognizable to Commission staff, thereby negating the efficiency the system was designed to create. As such, Frontier supports the Commission's use of pre-designated standardized functions like "Accounting" and "Legal Issues" as suggested in the *NPRM*.<sup>11</sup> Adoption of this process, along with the proposed process of ensuring that all FRN holders provide at least an email address upon registration,<sup>12</sup> would promote proper communication between the Commission and CORES users.

### **III. USER ID FLEXIBILITY WOULD BE A USEFUL FEATURE**

Frontier supports the Commission's tentative conclusion that "FRN holders should be provided with the ability to create, at their own discretion, a custom User ID."<sup>13</sup> Frontier stresses, however, that it is important that the option to use a different User ID remains voluntary as a mandated-shift of all user names would cause significant administrative burden on those using multiple FRNs. To that end, it is equally important that the FRN remains as the default User ID, as the Commission suggests,<sup>14</sup> unless changed by the FRN holder.

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<sup>10</sup> *Id.* at ¶ 26.

<sup>11</sup> *Id.*

<sup>12</sup> *Id.* at ¶ 40. Frontier supports the Commission's tentative conclusion that "all FRN holders should be required to provide an e-mail address upon registration."

<sup>13</sup> *Id.* at ¶ 42.

<sup>14</sup> *Id.*

One feature that Frontier requests the Commission consider developing is a “read-only” feature for third parties. This could be helpful in allowing Frontier to grant access to chosen third parties that have a legitimate interest in seeing the data already entered but do not have the need or authority to make changes in the system. FRN holders would then be able to create unique User IDs for third parties and grant them access to their FRN data through this process.

#### **IV. EMAIL NOTIFICATIONS ARE THE MOST EFFECTIVE MANNER OF ALERTING FRN HOLDERS OF ISSUES**

One of the benefits of collecting an email address from all FRN holders<sup>15</sup> and having specialized points of contact within a system is the capability to use that information when financial or other administrative issues arise to efficiently notify the correct party of the issue. While Frontier supports the Commission’s effort to ensure that any FRN-specific alerts or issues are displayed when the user logs-in to the system,<sup>16</sup> the Commission should take full advantage of having FRN holder contact information to notify the correct contact of the problem. Utilizing the contact information for proactive outreach about issues avoids the situation where a FRN holder is potentially unaware of an issue because he or she has not logged into the system recently, and thereby creates a more efficient and “real-time” status accountability.

#### **V. CORES UPDATES SHOULD AUTOPOPULATE OTHER COMMISSION LICENSING SYSTEMS**

The Commission seeks comment on whether “modifications or updates to information in ULS/CLS [should] be automatically imported into CORES, or vice versa.”<sup>17</sup> Frontier believes that it would be most useful if the changes to information in CORES were automatically imported to ULS/CLS. Frontier holds many more licenses included in the ULS/CLS system than

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<sup>15</sup> See *supra*, n. 11.

<sup>16</sup> *NPRM* at ¶ 46. Frontier encourages the Commission to keep any such alerts active until the issue is resolved; the alert should not disappear at first log-in.

<sup>17</sup> *Id.* at ¶ 56.

it does FRNs and it believes many other companies are similarly-situated. It would be the most efficient use of resources to make input fewer edits in CORES that would automatically make the changes in the ULS/CLS instead of many changes to populate a fewer number of CORES FRNs. A reasonable option with this system, and safeguard for users and the Commission, would be to require the user inputting the changes into CORES to check a box designating that the user would like the relevant information updated in ULS/CLS; without checking this box automatic changes would not be made. An additional safeguard would be to send confirmation emails to the correct point of contact in the CORES system notifying the contact of the changes made. These reforms would greatly improve CORES and ULS/CLS user efficiency.

## **VI. CONCLUSION**

For the foregoing reasons Frontier respectfully requests the Commission to implement the changes discussed above when revising its CORES database.

Respectfully submitted,

**Frontier Communications Corporation**

By:

/s/

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